

2/12/2018 8:15 AM

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

MAHMOOD SHAH

CRIMINAL NO. MJG-16-430

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FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2018 FEB 21 PM 12:04
CLERK'S OFFICE
AT BALTIMORE
BY _____ DEPUTY

GOVERNMENT'S EXHIBIT LIST

Exhibit No.	Description	ID	Admit
	<u>Wojtkonski Exhibits:</u>	FEB 12 2018	
1	Generic Food Stamp Independence Card	FEB 12 2018	
2	Listing of Store Size Classifications	FEB 12 2018	
3	Picture of Corner Grocery	FEB 12 2018	
4.1	Map of Location of Corner Grocery Wide	FEB 12 2018	
4.2	Map of Location of Corner Grocery Intermediate	FEB 12 2018	
4.3	Map of Location of Corner Grocery and stores within half mile	FEB 12 2018	
5.1	Corner Grocery FNS Form 252	FEB 12 2018	
5.2	Corner Grocery FNS Form 252 Associated Documents	FEB 12 2018	
6	Shahkhan, Inc. Articles of Incorporation	FEB 12 2018	
7	Bank of America Account *****4799 Signature Card	FEB 12 2018	
8	Corner Grocery Retailer Agreement EBT Program	FEB 12 2018	
9.1	"Legitimate" Food Stamp Transaction Chart	FEB 12 2018	
9.2	"Legitimate v. Fraudulent" chart	FEB 12 2018	
10	5 Twelve Food Mart FNS Form 252 and Associated Documentation		
11	Harford Citgo DBA RNA Gas FNS Form 252 and Associated Documentation	FEB 16 2018	
12.1	2009 Form 1120S for Shah Khan, Inc.	FEB 12 2018	

Exhibit No.	Description	ID	Admit
12.2	2009 Schedule K-1 for Shah Khan, Inc. showing Mahmood Shah as 100% owner	FEB 12 2018	
12.3	2010 Form 1120S for Shah Khan, Inc.	FEB 12 2018	
12.4	2010 Schedule K-1 for Shah Khan, Inc. showing Mahmood Shah as 100% owner	FEB 12 2018	
12.5	2011 Form 1120S for Shah Khan, Inc.	FEB 12 2018	
12.6	2012 Form 1120S for Shah Khan, Inc.	FEB 12 2018	
12.7	2014 Form 1120S for Shah Khan, Inc.	FEB 12 2018	
12.8	IRS Certificate of Lack of Record for 2013, 2015, 2016 Forms 1120S for Shah Khan, Inc.	FEB 12 2018	
12.9	2010 Form 1040 for Mahmood Shah	FEB 16 2018	
12.10	2011 Form 1040 for Mahmood Shah		
12.11	2012 Form 1040 for Mahmood Shah		
12.12	2013 Form 1040 for Mahmood Shah		
12.13	2014 Form 1040 for Mahmood Shah		
12.14	2015 Form 1040 for Mahmood Shah		
	<u>Wojtkonski Charts</u>		
13.1	Corner Grocery Total EBT Redemptions for Years 2011 through 2017	FEB 12 2018	
13.2	Corner Grocery versus State of Maryland Food Stamp Transactions	FEB 12 2018	
13.3	Corner Grocery versus Baltimore City Food Stamp Transactions	FEB 12 2018	
13.4	Corner Grocery Second Purchase Over \$40 and Within Two Minutes	FEB 12 2018	
13.5	Corner Grocery Two or More Transactions Done in 24 Hours	FEB 12 2018	
13.6	Corner Grocery 90% of Benefits Removed in One Day	FEB 12 2018	
13.7	All Corner Grocery Transactions – October 2010 – August 2016	FEB 12 2018	
13.8	All Corner Grocery Transactions – January 2016	FEB 13 2018	

Exhibit No.	Description	ID	Admit
	<u>September 11, 2012 Transaction</u>		
14.1	Disc of Videos – 9/11/2012 transaction	FEB 12 2018	
14.2	Screenshot store (9/11/2012)	FEB 12 2018	
14.3	Screenshot Rafiq (9/11/2012)	FEB 12 2018	
14.4	Receipt (9/11/2012)	FEB 12 2018	
14.5	July 2013 FNS Notice sent to Corner Grocery	FEB 12 2018	
	<u>February 10, 2015 Transaction</u>		
15.1	Disc of Videos – 2/10/2012 transaction	FEB 12 2018	
15.2	Screenshot Store, 2/10/2015	FEB 12 2018	
15.3	Screenshot Rafiq, 2/10/2015	FEB 12 2018	
15.4	Screenshot Cash, 2/10/2015	FEB 12 2018	
15.5	Receipt (2/10/2015)	FEB 12 2018	
	<u>March 13, 2015 Transaction</u>		
16.1	Disc of Videos – 3/13/2015 transaction	FEB 12 2018	
16.2	Screenshot Store, 3/13/2015	FEB 12 2018	
16.3	Screenshot Rafiq, 3/13/2015	FEB 12 2018	
16.4	Screenshot Cash, 3/13/2015	FEB 12 2018	
16.5	Receipt (3/13/2015)	FEB 12 2018	
	<u>April 14, 2015 Transaction</u>		
17.1	Disc of Video – 4/14/2015 unsuccessful transaction	FEB 13 2018	
17.2	Screenshot Store, 4/14/2015	FEB 13 2018	
	<u>May 15, 2015 Transaction</u>		
18.1	Disc of Videos – 5/15/2015 transaction (food stamps for cash)	FEB 13 2018	
18.2	Screenshot Store 5/15/2015	FEB 13 2018	
18.3	Screenshot Rafiq, 5/15/2015	FEB 13 2018	

Exhibit No.	Description	ID	Admit
18.4	Screenshot Rafiq, 5/15/2015	FEB 13 2018	
18.5	Receipt (5/15/2015)	FEB 13 2018	
	<u>July 9, 2015 Transaction</u>		
19.1	Disc of Videos – 7/9/2015 transaction (food stamps for cash)	FEB 13 2018	
19.2	Screenshot Store, 7/9/2015	FEB 13 2018	
19.3	Screenshot Rafiq, 7/9/2015	FEB 13 2018	
19.4	Receipt, 7/9/2015	FEB 13 2018	
	<u>October 19, 2015 Transaction</u>		
20.1	Disc of Videos–10/19/15 transaction (food stamps for cash)	FEB 13 2018	
20.2	Screenshot, 10/19/2015	FEB 13 2018	
20.3	Screenshot, 10/19/2015	FEB 13 2018	
20.4	Screenshot, 10/19/2015	FEB 13 2018	
20.5	Screenshot, 10/19/2015	FEB 13 2018	
20.6	Screenshot, 10/19/2015	FEB 13 2018	
20.7	Screenshot, 10/19/2015	FEB 13 2018	
20.8	Screenshot, 10/19/2015	FEB 13 2018	
20.9	Screenshot, 10/19/2015	FEB 13 2018	
20.10	Screenshot, 10/19/2015	FEB 13 2018	
20.11	Screenshot, 10/19/2015	FEB 13 2018	
20.12	Receipt, 10/19/2015	FEB 13 2018	
	<u>August 3, 2016 Transaction</u>		
21.1	Disc of Videos – 8/3/2016 transaction (food stamps for cash)	FEB 14 2018	
21.2	Screenshot Store, 8/3/2016	FEB 14 2018	
21.3	Screenshot, 8/3/2016	FEB 14 2018	
21.4	Screenshot, 8/3/2016	FEB 14 2018	
21.5	Screenshot, 8/3/2016	FEB 14 2018	

Exhibit No.	Description	ID	Admit
21.6	Screenshot, 8/3/2016	FEB 14 2018	
21.7	Screenshot, 8/3/2016	FEB 14 2018	
21.8	Screenshot, 8/3/2016	FEB 14 2018	
21.9	Screenshot, 8/3/2016	FEB 14 2018	
21.10	Screenshot, 8/3/2016	FEB 14 2018	
21.11	Screenshot, 8/3/2016	FEB 14 2018	
21.12	Screenshot, 8/3/2016	FEB 14 2018	
21.13	Screenshot, 8/3/2016	FEB 14 2018	
21.14	Screenshot, 8/3/2016	FEB 14 2018	
21.15	Receipt, 8/3/2016	FEB 13 2018	
	<u>Customer Exhibits:</u>		
22.1	Dewayne Ballard EPPIC Customer Information	FEB 13 2018	
22.2	Dewayne Ballard Corner Grocery Food Stamp Transactions October 2010 – August 2016 (no transactions)	FEB 13 2018	
23.1	Ronshay Chisolm EPPIC Customer Information	FEB 13 2018	
23.2	Ronshay Chisolm All Food Stamp Transactions – October 2010 – August 2016	FEB 13 2018	
23.3	Ronshay Chisolm Corner Grocery Food Stamp Transactions October 2010 – August 2016	FEB 13 2018	
23.4	Ronshay Chisolm Map	FEB 13 2018	
24.1	Johnny Clayton EPPIC Customer Information	FEB 13 2018	
24.2	Johnny Clayton All Food Stamp Transactions – October 2010 – August 2016	FEB 13 2018	
24.3	Johnny Clayton Corner Grocery Food Stamp Transactions October 2010 – August 2016	FEB 13 2018	
24.4	Johnny Clayton Map	FEB 13 2018	

Exhibit No.	Description	ID	Admit
25.1	Charles Edwards EPPIC Customer Information	FEB 13 2018	
25.2	Charles Edwards All Food Stamp Transactions – October 2010 – August 2016	FEB 13 2018	
25.3	Charles Edwards Corner Grocery Food Stamp Transactions October 2010 – August 2016	FEB 13 2018	
25.4	Charles Edwards Map	FEB 13 2018	
26.1	Jocelyn Jones EPPIC Customer Information	FEB 13 2018	
26.2	Jocelyn Jones All Food Stamp Transactions – October 2010 – August 2016	FEB 13 2018	
26.3	Jocelyn Jones Corner Grocery Food Stamp Transactions October 2010 – August 2016	FEB 13 2018	
26.4	Jocelyn Jones Map	FEB 13 2018	
27.1	Calandra Thomas EPPIC Customer Information	FEB 13 2018	
27.2	Calandra Thomas All Food Stamp Transactions – October 2010 – August 2016	FEB 13 2018	
27.3	Calandra Thomas Corner Grocery Food Stamp Transactions October 2010 – August 2016	FEB 13 2018	
27.4	Calandra Thomas Map	FEB 13 2018	
	<u>Gordills Exhibits:</u>		
28.1	7/12/2011 Receipt	FEB 13 2018	
28.2	7/13/2011 Receipt	FEB 13 2018	
28.3	7/14/2011 Receipts	FEB 13 2018	
28.4	7/14/2011 Gordills Yellow Slip	FEB 13 2018	
28.5	7/19/2011 Receipt	FEB 13 2018	
28.6	7/19/2011 Yellow Slip	FEB 13 2018	
28.7	Cash Photocopy, 7/14/11 & 7/19/11	FEB 13 2018	

Exhibit No.	Description	ID	Admit
	<u>Surveillance</u>		
29.1	Surveillance Photo 12/15/15 – Shah at Sam's	FEB 15 2018	
29.2	Surveillance Photo 12/15/15 – Shah at Corner Grocery	FEB 15 2018	
29.3	Surveillance Photo 12/15/15 – Shah at Corner Grocery	FEB 15 2018	
29.4	Surveillance Photo 12/15/15 – Shah at Corner Grocery	FEB 15 2018	
29.5	Surveillance Photo 12/15/15 – Shah at Corner Grocery	FEB 15 2018	
30.1	Surveillance Photo, April 18, 2016 - Rogue Driving	FEB 15 2018	
30.2	Surveillance Photo, April 18, 2016 - B. Green Cash & Carry	FEB 15 2018	
30.3	Surveillance Photo, April 18, 2016 - Shah at car	FEB 15 2018	
30.4	Surveillance Photo, April 18, 2016 - Shah Loading Merchandise at B. Green	FEB 15 2018	
30.5	Surveillance Photo, April 18, 2016 - Shah Outside Corner Grocery	FEB 15 2018	
	<u>Search of Store:</u>		
31.1	Photo Outside of Store	FEB 15 2018	
31.2	Photo Inside Store – front to back	FEB 15 2018	
31.3	Photo Inside Store – back to front	FEB 15 2018	
31.4	Photo of Room A	FEB 12 2018	
31.5	Photo of Room A	FEB 15 2018	
31.6	Photo of Room A – register area	FEB 12 2018	
31.7	Photo of Room A – register area, bottom drawer visible	FEB 15 2018	
31.8	Photo of Room A – register area, cash under counter	FEB 15 2018	
31.9	Photo of Room A – POS machine	FEB 15 2018	
31.10	Photo of Room A - documents in corner	FEB 15 2018	
31.11	Photo of Room C	FEB 15 2018	
31.12	Photos of Room C – box on shelf	FEB 15 2018	
32.1	Point of Sale Machine	FEB 12 2018	
32.2	Lease	FEB 15 2018	

Exhibit No.	Description	ID	Admit
32.3	Sale Agreement	FEB 15 2018	
32.4	BGE Bill	FEB 15 2018	
32.5	Rafiq Chapter 13 document	FEB 15 2018	
32.6	USDA Letter dated July 26, 2013	FEB 15 2018	
33	Empty		
34	Empty		
	<u>Shah Statement:</u>		
35.1	Video Recording of Mahmood Shah Interview, 8/30/2016 (approximately 33 minutes)	FEB 15 2018	
35.2	Miranda Waiver Form – Mahmood Shah	FEB 15 2018	
35.3	Transcript of Mahmood Shah Interview, 8/30/2016		
	<u>Muhammad Malik:</u>		
36.1	Draft 2013 Form 1120S for Shah Khan, Inc.	FEB 16 2018	
36.2	Handwritten notes		
36.3	Draft 2015 Form 1120S for Shah Khan, Inc.	FEB 16 2018	
36.4	Forms 1099-K from ACS State and Local Solutions and Xerox State and Local Solutions for tax years 2011, 2012, 2014, 2015, 2016	FEB 16 2018	
36.5	Forms 1099-K from Cynergy Data c/o Merchant Services for tax years 2011, 2012, 2014, 2015, 2016	FEB 16 2018	
36.6	2016 Form 1099-K from TSYS Merchant Solutions	FEB 16 2018	

Exhibit No.	Description	ID	Admit
	<u>Muhammad Rafiq:</u>		
37.1	Muhammad Rafiq Plea Agreement and Factual Stipulation		
37.2	Muhammad Rafiq Sealed Supplement		
	<u>Banking & Purchasing Exhibits (Zhana Johnson)</u>		
39	Zhana Johnson CV		
40	Bank of America Records - 4799	FEB 15 2018	
40.1	Signature Card - 4799	FEB 15 2018	
40.2	Detail Summary Spreadsheet	FEB 15 2018	
40.3	Deposits Pie Chart Summary	FEB 15 2018	
40.4	Deposits By Year Bar Graph	FEB 15 2018	
40.5	Disbursements Pie Chart Summary	FEB 15 2018	
40.6	Disbursements By Year Bar Graph	FEB 15 2018	
40.7	Personal Expenses Summary	FEB 15 2018	
40.8	Food Stamp Redemptions v. Cash, By Year	FEB 15 2018	
40.9	ATM images	FEB 15 2018	
41.1	Empty		
41.2	Gross Profit Analysis - Vendor Summary Table	FEB 15 2018	
41.3	Gross Profit Analysis (All Vendor Purchases)	FEB 15 2018	
41.4	Gross Profit Analysis (Eligible Purchases Only)	FEB 15 2018	
41.5	RMA 2013-214 Annual Statement - ID Only	FEB 15 2018	
41.6	RMA 2016-17 - ID Only	FEB 15 2018	
42	Chart: Vendor Purchases v Cost of Good Sold	FEB 15 2018	
43	Horseshoe Casino Records	FEB 16 2018	
44	Maryland Live Casino		
44.1-44.2	Shan's Maryland Live Player Records	FEB 15 2018	
45	B. Green Cash & Carry Milk Sign	FEB 15 2018	
46	Cv defendants Statements	FEB 14 2018	
50.1-50.6	Transaction detail Reports	FEB 14 2018	